

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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Case No.: **14-31508**  
Judge: **GMH**  
Chapter: **Chapter 13**

**In Re: Sarah Shaw**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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The Debtor, through Geraci Law, LLC, has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court  
517 East Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew Mark Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Sarah Shaw  
4666 N. 79<sup>th</sup> St.  
Milwaukee, WI 53218

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

## REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is the Debtor.
2. This is a request to modify a Chapter 13 Plan:
  - a.  post-confirmation
  - b.  pre-confirmation
    - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: account for feasibility with an anticipated supplemental mortgage arrearage claim, and 2014 income tax refunds due the Plan.
4. The reason(s) for the modification is/are: see above.
5. Select A or B:
  - A.  The confirmed Chapter 13 Plan is modified as follows: Debtor shall pay \$605 monthly for the remainder of the Plan, which shall run 60 months. Allowed general unsecured claims shall receive a pro rata share of not less than \$169 plus an additional \$2,536.50 representing 2014 income tax refunds due the Plan.
  - B.  The unconfirmed Chapter 13 Plan is modified as follows:

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

- 6. BY SIGNING BELOW THE PROONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

### **CERTIFICATION**

Complete one of the certifications below:

1. I/We, \_\_\_\_\_, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

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Debtor

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Date

---

Debtor

---

Date

OR

2. I, Andrew Golanowski, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Thursday, July 23, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney for Debtor  
Bar #: 1055499

**UNITED STATES BANKRUPTCY COURT  
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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Thursday, July 23, 2015:

**SEE ATTACHED LIST**

Sarah Shaw  
4666 N. 79<sup>th</sup> St.  
Milwaukee, WI 53218

Additionally, the documents referenced above were also served via electronic means on the following individuals on Thursday, July 23, 2015:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Thursday, July 23, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email:[wal@geracilaw.com](mailto:wal@geracilaw.com)

Label Matrix for local noticing  
0757-2  
Case 14-31508-gmh  
Eastern District of Wisconsin  
Milwaukee  
Thu Jul 23 11:17:58 CDT 2015

Allied Interstate  
Bankruptcy Dept.  
3000 Corporate Exchange Dr.  
5th Fl  
Columbus, OH 43231-7723

CAP1/Bostn  
Attn: Bankruptcy Dept.  
26525 N Riverwoods Blvd  
Mettawa, IL 60045-3440

Department Stores National Bank/Macy's  
Bankruptcy Processing  
Po Box 8053  
Mason, OH 45040-8053

MCI  
Attn: Bankruptcy Dept.  
500 Technology Dr Ste 30  
Weldon Spring, MO 63304-2225

Milwaukee County Circuit Court  
2003SC003797  
901 N. 9th ST.  
Milwaukee, WI 53233-1425

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

We Energies  
Attn Bankruptcy Dept. RM A130  
333 W Everett St  
Milwaukee WI 53290-0002

Wells Fargo Bank, N.A.  
c/o Wells Fargo Bank, N.A.  
Attn: Bankruptcy Department  
MAC #D3347-014 3476 Stateview Blvd  
Fort Mill, SC 29715

Wisconsin Electric POW  
Attn: Bankruptcy Dept.  
231 W Michigan St # A130  
Milwaukee, WI 53203-2918

Wells Fargo Bank, N.A.,  
c/o Gray & Associates, L.L.P.  
16345 West Glendale Drive  
New Berlin, WI 53151-2841

(p)AMERICAN HONDA FINANCE  
P O BOX 168088  
IRVING TX 75016-8088

COMENITY BANK/Bostonstr  
Attn: Bankruptcy Dept.  
3100 Easton Square Pl  
Columbus, OH 43219-6232

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta, GA 30374-0241

MILWAUKEE WATER WORKS  
200 E WELLS ST  
RM 800  
MILWAUKEE WI 53202-3515

Milwaukee Water Works  
Billing Dept.  
841 N. Broadway  
Milwaukee, WI 53202-3677

TIME Warner Milwaukee  
C/O Credit Management LP  
4200 International Pkwy  
Carrollton, TX 75007-1912

Webbank  
C/O Midland Funding  
8875 Aero Dr Ste 200  
San Diego, CA 92123-2255

Wells Fargo Financial  
Bankruptcy Dept.  
N81 W15104 Appleton Ave  
Menomonee Falls, WI 53051-3841

Alexander E. George  
Geraci Law L.L.C.  
55 E. Monroe #3400  
Chicago, IL 60603-5920

ADT Security Services  
Bankruptcy Department  
2250 W. Pinehurst Blvd.  
Addison, IL 60101-6100

American InfoSource LP as agent for  
Midland Funding LLC  
PO Box 268941  
Oklahoma City, OK 73126-8941

CashNetUSA.com  
Bankruptcy Department  
200 W. Jackson Blvd. #1400  
Chicago, IL 60606-6929

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen, TX 75013-2002

Mcydsnb  
Attn: Bankruptcy Dept.  
9111 Duke Blvd  
Mason, OH 45040-8999

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester, PA 19016-1000

Webbank/Fingerhut  
Attn: Bankruptcy Dept.  
6250 Ridgewood Rd  
Saint Cloud, MN 56303-0820

(p)WELLS FARGO BANK NA  
WELLS FARGO HOME MORTGAGE AMERICAS SERVICING  
ATTN BANKRUPTCY DEPT MAC X7801-014  
3476 STATEVIEW BLVD  
FORT MILL SC 29715-7203

Andrew M. Golanowski  
Geraci Law, L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920